

**THE UNITED STATES BANKRUPTCY COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

**IN RE:** :  
**RICHARD FLEMING** : **BK. No. 16-16033 MDC**  
**MIA FLEMING** :  
: **Chapter No. 13**  
**Debtors** :

**FREEDOM MORTGAGE CORPORATION**  
**Movant**

**v.**

**RICHARD FLEMING** **11 U.S.C. §362**  
**MIA FLEMING**  
**Respondents**

**NOTICE OF FORBEARANCE DUE TO THE COVID-19 PANDEMIC**

Now comes **FREEDOM MORTGAGE CORPORATION** (“Creditor”), by and through undersigned counsel, and hereby submits Notice of Forbearance to the Court based on the Debtors’ request for mortgage payment forbearance due to hardship caused by the COVID-19 pandemic.

The Debtor contacted Creditor requesting a forbearance period of 4 months and has elected to not tender mortgage payments to Creditor that would come due on the mortgage starting April 1, 2020 through July 31, 2020. Creditor has granted the Debtors’ forbearance request. To the extent the forbearance period is not extended for an additional period of time as provided under the CARES Act, Debtor will resume mortgage payments beginning August 1, 2020. Near the end of the forbearance period, debtor, through counsel, will need to engage with creditor on a solution for payments suspended during the forbearance.

Creditor does not waive any rights to collect the payments that come due during the forbearance period. Furthermore, Creditor does not waive its rights under other applicable non-bankruptcy laws and regulations, including, but not limited to, RESPA, and the right to collect on any post-petition escrow shortage.

Creditor does not waive its rights to seek relief from the automatic stay for other reasons other than non-payment of the Mortgage, including, but not limited to, a lapse in insurance coverage or payment of property taxes.

/s/ Thomas Song, Esquire

Thomas Song, Esq., Id. No.89834

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May 1, 2020

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**11 U.S.C. §362**

**Respondents**

**CERTIFICATE OF SERVICE**

I hereby certify that service upon all interested parties, indicated below was made by sending true and correct copies of the Notice of Forbearance by electronic means on May 1, 2020.

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/s/ Thomas Song, Esquire

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May 4, 2020